

**EXHIBIT C-16P**

**Gibson Dunn & Crutcher LLP**



780 NORTH WATER STREET  
MILWAUKEE, WISCONSIN 53202-3590  
TEL • 414.273.3500 FAX • 414.273.5198  
[www.gklaw.com](http://www.gklaw.com)

Lehman Brothers Holdings, Inc. Fee Committee  
Richard Gitlin, Chair

March 8, 2012

Re: Gibson Dunn & Crutcher LLP

Invoice No. 554848  
Matter No. 009878-016P

Billing Attorney:  
Brady C. Williamson

Invoice Total	\$ <u>15,212.00</u>
Prior Balance Due	\$ <u>0.00</u>
<b>Total Amount Now Due</b>	<b>\$ <u>15,212.00</u></b>

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE  
PLEASE RETURN THIS COPY WITH YOUR REMITTANCE.

**PLEASE SEND ALL PAYMENTS TO:**  
**GODFREY & KAHN, BIN #318, MILWAUKEE, WI 53288-0318**  
FED ID: 39-1128206

WIRE INSTRUCTIONS: BANK NAME: BMO HARRIS BANK N.A. BANK ABA: #075000051 ACCOUNT NAME: GODFREY & KAHN S.C.  
ACCOUNT NO: #291-714 SWIFT CODE: MARLUS 44 (IF INTERNATIONAL WIRE TRANSFER)

OFFICES IN MILWAUKEE, MADISON, WAUKESHA, GREEN BAY, APPLETON WI; AND WASHINGTON, DC



780 NORTH WATER STREET  
MILWAUKEE, WISCONSIN 53202-3590  
TEL • 414.273.3500 FAX • 414.273.5198  
[www.gklaw.com](http://www.gklaw.com)

Lehman Brothers Holdings, Inc. Fee Committee  
Richard Gitlin, Chair

March 8, 2012

Re: Gibson Dunn & Crutcher LLP

Invoice No. 554848  
Matter No. 009878-016P

Billing Attorney:  
Brady C. Williamson

For Legal Services Rendered Through August 31, 2011

Date	Timekeeper	Description	Hours	Amount
05-05-2011	Monica Santa Maria	Email correspondence with Mr. Graves on response to report.	0.10	24.00
05-06-2011	Katherine Stadler	Review correspondence from Gibson Dunn in response to draft report.	0.40	172.00
05-11-2011	Monica Santa Maria	Review response to report.	0.40	96.00
05-11-2011	Monica Santa Maria	Case law research regarding joint representation issues for Gibson Dunn.	0.70	168.00
05-17-2011	Monica Santa Maria	Conferences with Mr. Graves and Mr. Horowitz regarding possible extension of the negotiation and objection deadlines.	0.20	48.00
05-17-2011	Brady C. Williamson	Review email on disclosure question.	0.10	52.50
05-25-2011	Monica Santa Maria	Begin drafting response to partial settlement offer.	5.00	1,200.00
05-26-2011	Monica Santa Maria	Edit draft response to settlement offer.	1.40	336.00
05-26-2011	Brady C. Williamson	Review and revise Gibson Dunn letter.	0.70	367.50

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
05-26-2011	Katherine Stadler	Review and revise draft Gibson Dunn letter on disclosure issues, forwarding to fee committee for consideration.	0.90	387.00
06-01-2011	Patricia Wheeler	Review response to Gibson Dunn addressing issue of disclosures.	0.80	228.00
06-01-2011	Monica Santa Maria	Email correspondence with Mr. Horowitz regarding April monthly fee statement.	0.10	24.00
06-01-2011	Brady C. Williamson	Conference on open application issues and telephone call from U.S. Trustee's office.	0.20	105.00
06-01-2011	Katherine Stadler	Telephone conference with Ms. Hope Davis, U.S. Trustee, on revisions to Gibson Dunn letter.	0.20	86.00
06-02-2011	Monica Santa Maria	Review and edit draft response regarding outstanding issues.	0.10	24.00
06-02-2011	Brady C. Williamson	Additional revisions to correspondence on open issues.	0.20	105.00
06-03-2011	Monica Santa Maria	Review proposed edits from U.S. Trustee's office and edit response letter.	0.70	168.00
06-03-2011	Katherine Stadler	Review U.S. Trustee's proposed revisions to draft letter to Gibson Dunn and confer on substantive revisions.	0.40	172.00
06-05-2011	Brady C. Williamson	Review and revise correspondence.	0.80	420.00
06-06-2011	Monica Santa Maria	Edit response letter regarding open issues and forward to Mr. McArdle and Mr. Horowitz.	1.00	240.00
06-06-2011	Katherine Stadler	Review and revise latest correspondence to retained professional on disclosure issues and sixth interim fee application.	0.70	301.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
06-13-2011	Monica Santa Maria	Conferences with Mr. Horowitz regarding disclosure issues and time increments analysis and follow-up communication.	0.20	48.00
06-15-2011	Monica Santa Maria	Conference with Mr. Horowitz regarding disclosures related to third-party fees.	0.10	24.00
06-20-2011	Monica Santa Maria	Telephone conference with Mr. Horowitz regarding time increments issue and disclosure updates.	0.60	144.00
06-20-2011	Monica Santa Maria	Conference regarding outstanding disclosure issues and next steps in light of call from Mr. Horowitz.	0.20	48.00
06-22-2011	Monica Santa Maria	Conference with Mr. Horowitz regarding time increments issue.	0.20	48.00
06-22-2011	Monica Santa Maria	Conference with Mr. Horowitz regarding outstanding disclosure issues.	0.30	72.00
06-23-2011	Brady C. Williamson	Review February fee statement.	0.30	157.50
06-27-2011	Monica Santa Maria	Conference with Mr. McArdle regarding outstanding time increments issues.	0.30	72.00
06-27-2011	Monica Santa Maria	Conferences regarding outstanding disclosure and time increment issues.	0.20	48.00
06-30-2011	Monica Santa Maria	Review and consider response from Gibson Dunn to outstanding issues.	1.10	264.00
06-30-2011	Brady C. Williamson	Email from LBHI on Gibson Dunn payment.	0.20	105.00
06-30-2011	Brady C. Williamson	Review fee statement.	0.30	157.50
06-30-2011	Katherine Stadler	Review Gibson Dunn response and conference on strategy for resolving open issues.	0.90	387.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07-01-2011	Monica Santa Maria	Draft response regarding outstanding issues.	2.10	504.00
07-01-2011	Brady C. Williamson	Review and revise letter to Gibson Dunn.	0.60	315.00
07-06-2011	Sally Granec	Review spreadsheet of the seventh fee period to facilitate attorney review.	0.50	87.50
07-06-2011	Monica Santa Maria	Edit response to Mr. McArdle regarding outstanding issues.	0.30	72.00
07-06-2011	Monica Santa Maria	Conference with Mr. Horowitz regarding response letter and possible extension to negotiation period.	0.10	24.00
07-06-2011	Monica Santa Maria	Email regarding response letter and possible extension to negotiation period.	0.10	24.00
07-06-2011	Brady C. Williamson	Review latest correspondence.	0.30	157.50
07-06-2011	Katherine Stadler	Conference on status of negotiations with Gibson Dunn, review and edit correspondence and follow up e-mail exchange on further negotiations.	1.70	731.00
07-08-2011	Monica Santa Maria	Email correspondence with Mr. Horowitz regarding extension of time to resolve outstanding issues.	0.40	96.00
07-08-2011	Katherine Stadler	Conference on Gibson Dunn discussions, review Mr. Horowitz's most recent e-mail communication and re-draft response.	0.40	172.00
07-09-2011	Brady C. Williamson	Review email exchanges with professional.	0.40	210.00
07-10-2011	Monica Santa Maria	Review email from Mr. Horowitz providing further explanation of time increments issue.	0.10	24.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07-12-2011	Monica Santa Maria	Conference with Mr. Horowitz regarding firm's position on time increments issue.	0.10	24.00
07-14-2011	Monica Santa Maria	Draft letter to Gibson Dunn regarding fee committee decision to object if consensual resolution not reached.	0.20	48.00
07-15-2011	Monica Santa Maria	Review email correspondence to Mr. Horowitz and Mr. McArdle regarding fee committee authorization for objection.	0.10	24.00
07-15-2011	Brady C. Williamson	Review follow up correspondence on fee committee's decisions.	0.20	105.00
07-15-2011	Katherine Stadler	E-mail to Mr. Horowitz and Mr. McArdle on results of fee committee discussion on time increments issue and telephone conference with Mr. Horowitz.	0.70	301.00
07-18-2011	Monica Santa Maria	Review email summarizing settlement discussions.	0.10	24.00
07-18-2011	Brady C. Williamson	Review email summary on disagreements and resolution.	0.30	157.50
07-18-2011	Katherine Stadler	Telephone conference with Mr. McArdle on status of fee application negotiations and possible resolution.	0.30	129.00
07-18-2011	Katherine Stadler	E-mail to Mr. Gitlin on status of Gibson Dunn discussions and obtain recommendation from Mr. Gitlin on final resolution.	0.20	86.00
07-19-2011	Monica Santa Maria	Confirm total reductions for third fee application by email.	0.10	24.00
07-19-2011	Katherine Stadler	E-mail exchange with Mr. McArdle on settlement.	0.10	43.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07-20-2011	Monica Santa Maria	Review email from Mr. Horowitz regarding payment of holdback pending court approval of sixth interim fee stipulation.	0.10	24.00
07-20-2011	Monica Santa Maria	Email to Mr. Horowitz regarding timing of draft stipulation being prepared and forwarded.	0.10	24.00
07-21-2011	Katherine Stadler	Review e-mail from Mr. Horowitz on payment of holdbacks.	0.10	43.00
07-21-2011	Katherine Stadler	Review fifth interim compensation order and related correspondence with Gibson Dunn on scheduled amounts to be paid.	0.60	258.00
07-21-2011	Katherine Stadler	E-mail to Mr. Horowitz on schedule issues.	0.20	86.00
07-21-2011	Katherine Stadler	E-mail to Mr. Mieghan responding to his inquiry on discrepancy in Gibson Dunn data.	0.20	86.00
07-22-2011	Monica Santa Maria	Draft stipulation to resolve sixth interim period confidential letter report.	0.50	120.00
07-25-2011	Monica Santa Maria	Email correspondence to Mr. Horowitz regarding status of stipulation.	0.10	24.00
07-28-2011	Monica Santa Maria	Conferences with Mr. Horowitz regarding soon-to-be-filed amendments and supplements to third and fourth fee applications.	0.20	48.00
07-28-2011	Monica Santa Maria	Email regarding amendments to third and fourth fee applications.	0.10	24.00
07-28-2011	Brady C. Williamson	Review Gibson Dunn email exchange.	0.20	105.00
07-29-2011	Monica Santa Maria	Email correspondence with Mr. Horowitz regarding executing stipulation.	0.10	24.00
08-01-2011	Zerithe Raiche	Prepare and file stipulation on sixth fee period application.	0.30	49.50

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08-01-2011	Monica Santa Maria	Email correspondence with Mr. Horowitz on June fee statement.	0.10	24.00
08-02-2011	Monica Santa Maria	Email correspondence with Mr. Horowitz on forwarding electronic data for amended fee application.	0.10	24.00
08-04-2011	N. Talbott Settle	Review and profile to the system spreadsheet of the seventh fee period to facilitate review.	0.30	49.50
08-08-2011	N. Talbott Settle	Review correspondence from Ms. Barbour, BrownGreer, forwarding professional data without reductions and prepare for review.	0.40	66.00
08-08-2011	Monica Santa Maria	Email and telephone correspondence with Mr. Horowitz regarding extension to file fifth fee application.	0.20	48.00
08-08-2011	Monica Santa Maria	Review amended fourth fee application and certifications.	0.50	120.00
08-08-2011	Monica Santa Maria	Begin reviewing fee detail.	0.60	144.00
08-08-2011	Katherine Stadler	Review correspondence on timing of fifth interim fee application.	0.20	86.00
08-09-2011	Monica Santa Maria	Continue reviewing fee detail, identifying entries in support of possible objections.	2.00	480.00
08-10-2011	Monica Santa Maria	Review expense detail, identifying questionable entries.	0.20	48.00
08-10-2011	Monica Santa Maria	Review email from Mr. Horowitz explaining connection between Gibson Dunn and PricewaterhouseCoopers.	0.10	24.00
08-10-2011	Monica Santa Maria	Organize entries marked in support of possible objections in preparation for drafting report.	0.80	192.00
08-10-2011	Monica Santa Maria	Begin drafting report, with particular attention to summary of sixth interim concerns, billing activities, and rate increases.	4.00	960.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08-11-2011	Monica Santa Maria	Continue drafting report on fourth fee application.	1.50	360.00
08-12-2011	N. Talbott Settle	Prepare spreadsheet for preparation of report exhibits.	0.20	33.00
08-13-2011	N. Talbott Settle	Continue review and preparation of spreadsheet of exhibits.	2.30	379.50
08-13-2011	Brady C. Williamson	Review and revise report.	0.60	315.00
08-15-2011	N. Talbott Settle	Review report exhibits.	0.20	33.00
08-15-2011	Katherine Stadler	Review and revise draft letter report.	1.00	430.00
08-18-2011	N. Talbott Settle	Review of the exhibits and letter report to verify of citations and data.	2.20	363.00
08-18-2011	Monica Santa Maria	Conference on exhibit preparation.	0.10	24.00
08-19-2011	N. Talbott Settle	Verify data for non-compensable billing and specific timekeepers.	1.30	214.50
08-19-2011	N. Talbott Settle	Revise Exhibit A to report.	0.50	82.50
08-19-2011	Monica Santa Maria	Conference on exhibit preparation.	0.10	24.00
08-23-2011	Monica Santa Maria	Email Mr. Horowitz on report for sixth interim period.	0.10	24.00
08-23-2011	Monica Santa Maria	Conference with Mr. Horowitz on currency exchange calculations for seventh interim fee application.	0.10	24.00
08-23-2011	Katherine Stadler	E-mail to U.S. Trustee's office following up on draft letter report to Gibson Dunn.	0.10	43.00
Total Fees			\$	15,212.00
Total Disbursements			\$	0.00
<b>Total For This Invoice</b>			<b>\$</b>	<b>15,212.00</b>

### Time and Fee Summary

Timekeeper	Title	Hours	Rate	Amount
ZERITHEA RAICHE	Paralegal	0.30	165.00	49.50
N. TALBOTT SETTLE	Paralegal	7.40	165.00	1,221.00
SALLY GRANEC	Paralegal	0.50	175.00	87.50
<b>Paralegal Total</b>		<b>8.20</b>		<b>1,358.00</b>
PATRICIA WHEELER	Associate	0.80	285.00	228.00
MONICA SANTA MARIA	Associate	28.30	240.00	6,792.00
<b>Associate Total</b>		<b>29.10</b>		<b>7,020.00</b>
BRADY C. WILLIAMSON	Shareholder	5.40	525.00	2,835.00
KATHERINE STADLER	Shareholder	9.30	430.00	3,999.00
<b>Shareholder Total</b>		<b>14.70</b>		<b>6,834.00</b>
<b>TIMEKEEPER TOTALS</b>		<b>52.00</b>		<b>\$15,212.00</b>

*We adjust our hourly billing rates effective January 1 of each year. Accordingly, billing rate changes are reflected on this statement for work performed in 2012. Information regarding the hourly rates applicable to our attorneys and other personnel working on your matters is available on request from our billing department.*